

# EXHIBIT A

*to*

*House Defendants' and Senate Defendants'  
Objections to Plaintiffs' Rule 26(a)(3)  
Disclosures*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and all  
other similarly situated persons,

Plaintiffs,

v.

THOMAS C. ALEXANDER, in his official  
capacity as President of the Senate; LUKE A.  
RANKIN, in his official capacity as Chairman  
of the Senate Judiciary Committee; JAMES H.  
LUCAS, in his official capacity as Speaker of  
the House of Representatives; CHRIS  
MURPHY, in his official capacity as Chairman  
of the House of Representatives Judiciary  
Committee; WALLACE H. JORDAN, in his  
official capacity as Chairman of the House of  
Representatives Elections Law Subcommittee;  
HOWARD KNAPP, in his official capacity as  
interim Executive Director of the South  
Carolina State Election Commission; JOHN  
WELLS, Chair, JOANNE DAY,  
CLIFFORD J. EDLER, LINDA MCCALL,  
and SCOTT MOSELEY, in their official  
capacities as members of the South Carolina  
Election Commission,

Defendants.

Case No. 3:21-cv-03302-MGL-TJH-RMG

**THREE-JUDGE PANEL**

**OBJECTIONS TO PLAINTIFFS'  
CONGRESSIONAL PLAN RULE  
26(a)(3) PRETRIAL DISCLOSURES BY  
HOUSE DEFENDANTS AND SENATE  
DEFENDANTS**

**EXHIBIT A – OBJECTIONS TO  
PLAINTIFFS' DEPOSITION  
DESIGNATIONS**

Defendants James H. Lucas (in his official capacity as the former Speaker of the South  
Carolina House of Representatives<sup>1</sup>), Chris Murphy (in his official capacity as Chairman of the

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<sup>1</sup> On May 12, 2022, James H. Lucas stepped down as Speaker of the South Carolina House of  
Representatives. The current Speaker of the House is Representative G. Murrell Smith, Jr.

South Carolina House of Representatives Judiciary Committee), and Wallace H. Jordan (in his official capacity as Chairman of the South Carolina House of Representatives Redistricting Ad Hoc Committee) (collectively, the “**House Defendants**”), and Thomas C. Alexander (in his official capacity as President of the Senate) and Luke A. Rankin (in his official capacity as Chairman of the Senate Judiciary Committee) (collectively, the “**Senate Defendants**”), by and through their undersigned counsel, in accordance with Federal Rule of Civil Procedure 26(a)(3), hereby jointly provide “a list disclosing (i) any objections to the use under Rule 32(a) of a deposition designated by another party under Rule 26(a)(3)(B) and (ii) any objection, together with the grounds therefor, that may be made to the admissibility of materials identified under Rule 26(a)(3)(C).” As a general objection, Rule 32 allows for the designations of deposition testimony, not exhibits to those depositions; as such, House Defendants and Senate Defendants object to Plaintiffs’ designation of exhibits herein.

Note “\*” indicates designation range includes deposition testimony designated, and, as such, deemed confidential in accordance with the Consent Confidentiality Order, ECF No. 123.

<b>REP. CHRIS MURPHY (VOL.1 – HOUSE PLAN LITIGATION – MAY 4, 2022)</b>		
<b>PLAINTIFFS’ DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER- DESIGNATIONS</b>
6:11-22		
9:6-10:22	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
18:1-5		
19:10-22		
22:9-25		
25:23-26:12	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
28:4-31:8	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
32:5-33:8	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	
33:19-37:15	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
69:5-71:7	Rules 401-402: relevance; Rule 403: prejudice, waste of time	71:8 – 73:9
74:23-80:18	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
81:15-25	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
83:8-96:21	Rule 803: hearsay	
*98:9-109:1	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time	
*109:11-113:23	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	113:25 – 116:6
116:15-120:2	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	
*122:9-144:17	<p><b>General objection:</b> This portion of designations includes a large swatch of testimony to which it is difficult, if not impossible, to articulate narrow, specific, and coherent objections.</p> <p><b>Specific objections:</b> Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 803: hearsay</p>	
*146:19-151:14	<p><b>General objection:</b> This portion of designations includes a large swatch of testimony to which it is difficult, if not impossible, to articulate narrow, specific, and coherent objections.</p> <p><b>Specific objections:</b></p>	

	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	
169:22-171:11	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	159:12 – 169:21; 171:12 – 21
171:22-174:12		
*181:11-185:13	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	
*201:19-270:25	<p><b>General objection:</b> This portion of designations includes a large swatch of testimony to which it is difficult, if not impossible, to articulate narrow, specific, and coherent objections.</p> <p><b>Specific objections:</b> Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 501: privilege; Rule 803: hearsay</p>	276:2 – 286:12
*Exhibit 3	Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 4	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
*Exhibit 5	Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
*Exhibit 7	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
*Exhibit 8	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
*Exhibit 9	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
*Exhibit 12	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
*Exhibit 13	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
*Exhibit 14	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 501: privilege; Rule 602:	

	foundation; Rule 802: hearsay; Rule 901(a): authentication	
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<b>REP. CHRIS MURPHY (JUNE 23, 2022)</b>		
<b>PLAINTIFFS' DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER-DESIGNATIONS</b>
6:7-7:10	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
8:22-10:10	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
13:5-15:2	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
15:8-20:3		
21:23-22:13	Rules 401-402: relevance; Rule 403: prejudice, waste of time	21:10 – 22
*23:23-24:10	Rule 501: privilege	
*25:2-25	Rule 501: privilege	
26:6-27:22	Rules 401-402: relevance; Rule 403: prejudice, waste of time	26:1 – 5; 27:22 – 28:2
28:8-19		
28:23-29:2	Rules 401-402: relevance; Rule 403: prejudice, waste of time	29:3 – 10
29:11-30:12		
30:15-33:10	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
33:15-34:25	Rules 401-402: relevance; Rule 403: prejudice	35:1 – 3
35:4-37:9		
37:15-38:13	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice	38:14 – 16; 42:25 – 46:20
*38:17-40:20	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice	42:25 – 46:20
*42:4-12	Rule 501: privilege	
*42:18-22	Rule 501: privilege; Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice	42:23 – 24; 42:25 – 46:20
47:1-48:11	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice	42:25 – 46:20
49:10-16	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice	42:25 – 46:20; 48:12 – 49:9
50:4-7	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice	50:8 – 19; 51:3 – 9 51:20
*50:20-51:2	Rule 501: privilege; Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice	50:8 – 19; 51:3 – 9 51:20

*51:10-19	Rule 501: privilege; Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice	50:8 – 19; 51:3 – 9 51:20
51:21-24	Rules 401-402: relevance; Rule 403: prejudice	
52:12-56:18	Rules 401-402: relevance; Rule 403: prejudice; Rule 803: hearsay	
59:3-67:3	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 803: hearsay	
67:21-73:10	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	73:11 – 13
73:14-75:23	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	
77:25-79:20	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	
80:19-82:7	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
83:9-24	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	
84:2-4	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	
*84:22-88:17	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 803: hearsay	
89:16-23	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
90:10-93:15	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	
93:20-94:13	Rules 401-402: relevance, compound; Rule 403: prejudice, waste of time, confusing	94:14 – 16
94:17-95:6	Rules 401-402: relevance, compound; Rule 403: prejudice, waste of time, confusing	94:14 – 16
95:10-96:2	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
*96:18-103:3	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation	
103:10-104:11	Rules 401-402: relevance; Rule 403: prejudice, waste of time	

<b>REP. WM. WESTON NEWTON (VOL. 1 – HOUSE PLAN LITIGATION – APRIL 13, 2022)</b>		
<b>PLAINTIFFS’ DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER-DESIGNATIONS</b>
7:24-8:7		
35:11-37:3		
38:22-39:15		
42:1-6		
44:17-54:3	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 803: hearsay	
56:20-74:15	<p><b>General objection:</b> This portion of designations includes a large swatch of testimony to which it is difficult, if not impossible, to articulate narrow, specific, and coherent objections.</p> <p><b>Specific objections:</b> Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 803: hearsay</p>	
76:2-79:21	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 803: hearsay	
84:13-97:2	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
97:24-103:16	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 803: hearsay	
110:7-113:18	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
120:13-130:18	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 803: hearsay	130:19 – 133:8
133:9	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
134:23-136:1	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, waste of time	136:2 – 137:9
137:10-138:19	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, waste of time	138:20 – 139:14
150:17-151:25	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, waste of time	144:23 – 149:20; 152:1 – 10
Exhibit 3	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 4	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 5	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	



Exhibit 6	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 7	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 8	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	

REP. WM. WESTON NEWTON (JUNE 22, 2022)		
PLAINTIFFS' DESIGNATIONS	OBJECTIONS	COUNTER-DESIGNATIONS
7:10-13		
8:14-9:15		
*22:6-202:4	<p><b>General objection:</b> This portion of designations includes a large swatch of testimony to which it is difficult, if not impossible, to articulate narrow, specific, and coherent objections.</p> <p><b>Specific objections:</b>  Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 803: hearsay</p>	202:24 – 210:4

<b>REP. NEAL COLLINS (JULY 28, 2022)</b>		
<b>PLAINTIFFS' DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER-DESIGNATIONS</b>
4:23-5:1		
8:9-9:9	Rules 401-402: relevance; Rule 403: waste of time	
16:17-21:14	Rules 401-402: relevance; Rule 403: waste of time, confusing the issues	16:3-16
29:22-31:3		29:5-21
36:5-42:16	Rules 401-402: relevance; Rule 403: waste of time, confusing the issues	42:17-43:24
44:3-45:22	Rules 801-802: hearsay	45:23-46:16
47:3-49:21	Rules 401-402: relevance; Rule 403: waste of time, confusing the issues, cumulative evidence; Rule 501: privilege (legislative); Rules 801-802: hearsay	49:22-50:7
51:9-22	Rule 403: waste of time, confusing the issues, cumulative evidence; Rule 501: privilege (legislative)	50:16-51:8
52:2-56:19	Rule 403: waste of time, confusing the issues, cumulative evidence; Rule 501: privilege (legislative)	
57:2-61:9	Rule 403: waste of time, confusing the issues, cumulative evidence; Rule 501: privilege (legislative); Rule 602: foundation; Rules 801-802: hearsay	
62:17-63:25*	Rule 403: waste of time, confusing the issues; 501: privilege (legislative)	64:1-11
64:12-23*	Rules 401-402: relevance; Rule 403: waste of time, confusing the issues; Rule 501: privilege (legislative); Rule 602: foundation	
67:5-12*	Rule 403: confusing the issues; Rule 501: privilege (legislative)	68:1-8
68:25-69:7*	Rule 403: confusing the issues; Rule 501: privilege (legislative); Rule 602: foundation	
70:7-15	Rule 501: privilege (legislative)	
72:21-74:2*	Rules 401-402: relevance; Rule 403: waste of time, confusing the issues; Rule 501: privilege (legislative); Rule 602: foundation	
77:14-78:23*	Rule 501: privilege (legislative); Rules 801-802: hearsay	
82:5-21	Rule 602: foundation	81:25-82:2
88:13-94:10*	Rule 403: confusing the issues; Rule 501: privilege (legislative); Rule 602: foundation; Rules 801-802: hearsay	
94:18-96:3	Rules 401-402: relevance; Rule 403: waste of time, confusing the issues, cumulative evidence; Rule 501: privilege (legislative)	
98:14-18	Rules 401-402: relevance; Rule 403: waste of time; Rules 801-802: hearsay	

101:20-106:18*	Rules 401-402: relevance; Rule 403: waste of time, confusing the issues; Rule 501: privilege (legislative); Rules 801-802: hearsay	
111:11-113:12	Rule 403: confusing the issues; Rule 501: privilege (legislative); Rules 801-802: hearsay	111:5-10
115:13-118:14*	Rules 401-402: relevance; Rule 403: waste of time, confusing the issues; Rule 501: privilege (legislative)	
119:2-120:13	Rule 501: privilege (legislative)	118:16-119:1
120:18-121:8	Rule 403: confusing the issues	
122:1-123:6	Rule 602: foundation; Rules 801-802: hearsay	121:9-25
126:4-127:23	Rule 403: confusing the issues; Rule 602: foundation; Rules 801-802: hearsay	
128:10-15		
130:2-13*	Rules 401-402: relevance; Rule 403: waste of time; confusing the issues, cumulative evidence; Rule 501: privilege (legislative)	
130:17-20*	Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege (legislative)	
131:7-16	Rule 403: confusing the issues; Rule 501: privilege (legislative)	
134:16-144:18*	Rules 401-402: relevance; Rule 403: waste of time, confusing the issues; Rule 501: privilege (legislative); Rules 801-802: hearsay	
144:25-150:18	Rule 403: waste of time, confusing the issues; Rule 501: privilege (legislative); Rules 801-802: hearsay	
153:7-22*	Rule 403: waste of time, cumulative evidence; Rule 501: privilege (legislative)	

<b>EMMA DEAN (VOL. 1 FOR HOUSE PLAN LITIGATION – MAY 2, 2022)</b>		
<b>PLAINTIFFS’ DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER- DESIGNATIONS</b>
	<b>General Objection:</b> Rules 401, 402, and 403: relevance to Congressional plan litigation	
10:6-14	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time; Rule 602: foundation; Rule 802: hearsay	
12:2-12*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege; Rule 602: speculation	12:13-13:12
16:13-21:2*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege; Rule 602: speculation	21:3-5
21:18-25:16	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege; Rule 602: speculation	
35:5-36:8	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time	36:9-16
37:24-41:11	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time	
41:21-44:6	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time	
45:18-49:22	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege	
70:22-74:5	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
79:18-81:10	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege	81:11-25
83:13-88:19	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege (legislative)	
90:18-115:4*	<b>General objection:</b> This portion of designations includes a large swatch of testimony to which it is difficult, if not impossible, to articulate narrow, specific, and coherent objections. <b>Specific objections:</b> Rule 106: completeness; Rules 401-402: relevance;	

	Rule 403: waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
115:25-128:17*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
128:21-138:15*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
138:23-143:4*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	143:5-14
143:19-144:7*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	144:8-146:4
146:5-148:16*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
149:4-152:2*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	152:3-153:8
153:9-163:11	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege (legislative); Rule 602: foundation/speculation; Rule 802: hearsay	
163:20-174:8*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
175:20-187:14*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege;	188:6-11

	Rule 602: foundation/speculation; Rule 802: hearsay	
189:14-197:18*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	
198:19-22*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time	
199:8-229:9*	<p><b>General objection:</b> This portion of designations includes a large swatch of testimony to which it is difficult, if not impossible, to articulate narrow, specific, and coherent objections.</p> <p><b>Specific objections:</b> Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/confusion/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay.</p>	
230:5-234:8	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay.	
234:14-21*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/confusion/waste of time/cumulative	
236:23-239:6*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege	235:7-236:22; 239:7-22
239:23-254:21*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay.	
255:21-256:22	Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
257:5-266:2*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay.	

275:3-20*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 802: hearsay.	275:25-276:9
297:3-308:5	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/confusion/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay.	
	<b>General Objection:</b> Under Rule 32 allows for the designations of deposition testimony, not exhibits to those depositions.	
Exhibit 3*	Rules 401-402: relevance; Rule 403: prejudice/confusion/ waste of time/cumulative; Rule 501: privilege (legislative); Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication.	
Exhibit 4*	Rule 501: privilege (legislative); Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication.	
Exhibit 5	Rules 401-402: relevance; Rule 403: prejudice/confusion/waste of time/cumulative; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication.	
Exhibit 6	Rules 401-402: relevance; Rule 403: prejudice/confusion/waste of time/cumulative; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 7	Rules 401-402: relevance; Rule 403: prejudice/confusion/waste of time/cumulative; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 8*	Rules 401-402: relevance; Rule 403: prejudice/confusion/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 9*	Rules 401-402: relevance; Rule 403: prejudice/confusion/waste of time/cumulative; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	

Exhibit 10	Rule 106: completeness; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 12*	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 13*	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	



<b>EMMA DEAN (VOL. 2 ON JULY 6, 2022)</b>		
<b>PLAINTIFFS' DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER-DESIGNATIONS</b>
7:16-22	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time; Rule 602: foundation; Rule 802: hearsay	
9:10-12:11	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation	
16:16-20	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
18:24-19:18	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	19:19-20
21:11-50:19	<p><b>General objection:</b> This portion of designations includes a large swatch of testimony to which it is difficult, if not impossible, to articulate narrow, specific, and coherent objections.</p> <p><b>Specific objections:</b> Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay</p>	
51:8-111:16	<p><b>General objection:</b> This portion of designations includes a large swatch of testimony to which it is difficult, if not impossible, to articulate narrow, specific, and coherent objections.</p> <p><b>Specific objections:</b> Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay</p>	
117:10-119:24	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation	119:25-120:14

<b>THOMAS HAUGER (VOL. 1 FOR HOUSE PLAN LITIGATION – APRIL 29, 2022)</b>		
<b>PLAINTIFFS’ DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER- DESIGNATIONS</b>
5:1-12	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative	
15:11-24	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
18:21-19:2	Rules 401-402: relevance; Rule 403: cumulative	
27:17-32:16*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
33:6-34:10	Rules 401-402: relevance; Rule 403: cumulative	
38:4-39:18	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
40:2-43:6	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation	
50:3-52:14	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	
56:14-17	Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
63:10-19	Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
66:9-18*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege (legislative)	66:19-23
70:9-72:18	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege (legislative); Rule 802: hearsay	
75:15-20	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	
78:17-80:25	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of	

	time/cumulative; Rule 602: foundation/speculation	
83:11-14	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
83:20-85:5	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	
86:13-89:13	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	
91:3-93:4	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	
94:12-98:11	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	
100:13-23	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	
101:4-12	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	
101:24-102:13	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	
109:5-110:1 *	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege (legislative)	110:2-21
118:11-121:21	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	118:3-10
122:14-123:10	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	123:11-23
124:19-127:22	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of	123:23-25

	time/cumulative; Rule 602: foundation/speculation	
131:12-17	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative	
132:6-133:16*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	133:12-134:2
134:21-135:5*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative	
135:13-136:3*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 501: privilege	
139:2-14*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative	139:15-19
143:13-145:2	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	
147:18-148:3	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
149:3-19	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation	
151:4-12	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	
153:4-19	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	153:20-22
158:21-24	Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
161:2-8	Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
164:8-165:2	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of	

	time/cumulative; Rule 602: foundation/speculation	
	<b>General Objection:</b> Under Rule 32 allows for the designations of deposition testimony, not exhibits to those depositions.	
Exhibit 1*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 9*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 14*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	

<b>THOMAS HAUGER (JUNE 28, 2022)</b>		
<b>PLAINTIFFS' DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER-DESIGNATIONS</b>
3:1-21	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative	
7:4-7	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative	
10:4-12:25	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative	
16:14-21	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative	
17:11-22:17	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation	17:5-10
23:16-25:5	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	25:6-14
25:21-24	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
26:10-27:10	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
28:12-38:22*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	38:23-39:4
39:5-40:17	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	40:18-23
41:3-42:10	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	42:11-43:4

44:8-10	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
45:11-21	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
50:1-51:14	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
52:6-53:17	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	53:18-21
53:22-57:3	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 602: foundation/speculation	
57:24-58:11	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 602: foundation/speculation	
58:17-68:4	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege (legislative); Rule 602: foundation/speculation	
69:8-75:22*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege (legislative); Rule 602: foundation/speculation; Rule 802: hearsay	75:23-76:5
76:18-77:4	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	77:5-8
77:13-79:25	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	
80:1-86:23	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	86:24-87:8
88:13-90:21	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of	90:22-91:10

	time/cumulative; Rule 602: foundation/speculation;	
91:11-106:13	<p><b>General objection:</b> This portion of designations includes a large swatch of testimony to which it is difficult, if not impossible, to articulate narrow, specific, and coherent objections.</p> <p><b>Specific objections:</b> Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay</p>	106:14-22
107:17-108:9	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	107:6-16
110:14-113:15*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 602: foundation/speculation	
114:1-118:2*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
118:14-18	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative; Rule 602: foundation/speculation	
119:1-12	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative	
121:5-14	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time/cumulative	121:15-19
122:10-123:12	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	
124:16-127:10	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	127:11-21
138:4-139:15*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	130:15-131:24



141:14	Rule 106: completeness; Rules 401-402: relevance	
142:9-144:12	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice/waste of time/cumulative	

<b>DEPOSITION OF REP. JUSTIN BAMBERG (8.11.2022)</b>		
<b>PLAINTIFFS' DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER-DESIGNATIONS</b>
27:16-27:21	Rule 106: completeness; Rules 401-402; relevance	27:9-27:23
44:13-17		
45:2-46:25	Rules 401-402: relevance; Rule 403: waste of time	
47:5- 56:12		
56:25-57:15		
58:1-59:18		
60:3-62:17	Rule 106: Completeness	60:3-65:10
65:11-65:22		
71:17-73:23*	Rule 403: waste of time, cumulative evidence; Rule 501: privilege	75:21-76:19
77:1-78:2	Rules 401-402: relevance; Rule 403: waste of time	79:7-81:14
84:5-84:14	Rules 401-402: relevance; Rule 501: privilege	
85:4-86:17	Rules 401-402: relevance; Rule 403: waste of time; Rule 602: foundation, lack of personal knowledge	
87:7-14	Rules 401-402: relevance; Rule 403: waste of time;	
88:6-88:18	Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege	
88:25-89:19*	Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege	
90:11-20	Rule 501: privilege	
91:1- 92:21*	Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege; Rule 602: foundation	
93:11-15*	Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege; Rule 602: foundation	94:3-6
98:19- 99:100:11	Rules 401-402: relevance; Rule 403: waste of time Rule 501: privilege	
100:24-103:8	Rules 401-402: relevance; Rule 403: waste of time, cumulative; Rule 501: privilege; Rule 602: foundation, lack of personal knowledge	103:9-103:18
105:17- 110:18*	Rule 403: cumulative; Rule 501: privilege; Rule 602: foundation, lack of personal knowledge Rules 801-802: hearsay	

111:1-113:5	Rule 403: cumulative; Rule 501: privilege; Rules 801-802: hearsay; Rule 602: foundation, lack of personal knowledge	
113:14-113:23	Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege; Rule 602: foundation, lack of personal knowledge	
115:24-116:8	Rules 401-402: relevance; Rule 403: waste of time	
117:2-6	Rule 501: privilege; Rule 602: foundation	116:22-116:25
117:18-118:6	Rules 401-402: relevance; Rule 403: waste of time;	
118:16-119:9	Rules 401-402: relevance; Rule 403: waste of time	119:10-120:9
120:10-125:7	Rule 106: completeness; Rules 401-402: relevance; Rule 403: waste of time; Rule 501: privilege; Rule 602: foundation	
125:17-130:20	Rules 401-402: relevance; Rule 403: waste of time	
131:8-133:1	Rules 401-402: relevance; Rule 403: waste of time	
Exhibit 2	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 3	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 4	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 5	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 6	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 7	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	

<b>REP BETH BERNSTEIN (08.10.2022)</b>		
<b>PLAINTIFFS' DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER-DESIGNATIONS</b>
5:15-23		
14:5-16:3	Rules 401-402: relevance; Rule 403; confusing the issues, cumulative; not testimony	
23:6-25:24*	Rules 401-402: relevance; Rule 501: privilege	
26:7-27:11	Rules 401-402: relevance; Rule 403: waste of time	
40:6-41:23	Rules 401-402: relevance	
45:17-50:4	Rules 401-402: relevance; Rule 403: waste of time	
51:11-54:14	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, waste of time	51:10
55:3-59:14	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
59:25-101:12*	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time, confusing the issues; Rule 602: foundation; Rules 801-802: hearsay	
101:21-112:3	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rules 801-802: Hearsay	
113:16-188:5*	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: lack of personal knowledge, foundation; Rules 801-802: hearsay	
188:21-196:10*	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rules 801-802: hearsay	
196:19-212:7*	Rule 501: privilege; Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rules 801-802: hearsay; asked and answered; speculation	213:3-213:23
213:24-231:24	Rules 401-402: relevance; Rule 403: prejudice, waste of time Rule 602: lack of personal knowledge, foundation; Rules 801-802: hearsay	
		232:23-234:5
		234:12- 235:8
		236:19-237:2
		237:20-238:2
		239:7-239:11
		240:9-240:15
		240:16-242:15
		242:19-252:12
		252: 23-253:11
		254:20-257:18
		258:13-265:3
		265:8-274:6

<b>REP WALLACE H. JORDAN (VOL. 1 – HOUSE PLAN LITIGATION – APRIL 13, 2022)</b>		
<b>PLAINTIFFS’ DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER- DESIGNATIONS</b>
8:17-20		
24:4-11		
25:10-26:19	Rules 401-402: relevance; Rule 403: prejudice, waste of time	25:5 – 9
27:11-14	Rules 401-402: relevance, argumentative, assuming facts not in question; Rule 403: prejudice, waste of time	25:5 – 9; 28:1 – 4
28:5-11	Rules 401-402: relevance, argumentative, assuming facts not in question; Rule 403: prejudice, waste of time; Rule 803: hearsay	25:5 – 9; 28:1 – 4
29:9-31:2	Rules 401-402: relevance; Rule 403: prejudice, waste of time	31:3 – 10
32:1-9	Rules 401-402: relevance, argumentative, assuming facts not in question; Rule 403: prejudice, waste of time	32:10 – 15
33:2-9	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
37:20-38:3		
38:16-41:10	Rule 803: hearsay	
62:21-63:7	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 803: hearsay	63:8 – 14; 64:16 – 65:1; 65:5 – 8
63:15-64:15	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 803: hearsay	63:8 – 14; 64:16 – 65:1; 65:5 – 8
65:2-4	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 803: hearsay	63:8 – 14; 64:16 – 65:1; 65:5 – 8
65:9-66:5		
69:17-70:4	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
71:16-72:3		
78:3-14	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 803: hearsay	
79:2-8	Rule 106: completeness	78:15 – 79:1
82:10-84:3		
93:18-94:1		
94:12-95:21	Rules 401-402: relevance, speculation; Rule 403: prejudice, waste of time	
98:5-15	Rules 401-402: relevance, compound question; Rule 403: prejudice, waste of time	
99:10-18	Rule 106: completeness	99:5 – 9; 99:19 – 100:15

101:2-103:5	Rule 106: completeness; Rules 401-402: relevance, speculation; Rule 403: prejudice, waste of time	103:6 – 14
103:15-105:7	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
105:17-106:5		
111:16-112:16	Rule 803: hearsay	
114:19-115:7	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, waste of time	115:8 – 116:11
116:12-16	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, waste of time	115:8 – 116:11
120:10-121:10	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, waste of time	121:11 – 15
123:14-126:3	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 803: hearsay	
138:9-139:16	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
149:4-16	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
174:10-14	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
175:2-6	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
178:5-11		
205:2-10		
206:19-207:21		
*215:9-14	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time	
Exhibit 3	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 7	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 8	Rules 401-402: relevance; Rule 403: prejudice, waste of time; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
*Exhibit 9	Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Exhibit 14	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	

<b>REP WALLACE H. JORDAN (JULY 21, 2022)</b>		
<b>PLAINTIFFS' DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER-DESIGNATIONS</b>
231:7-10		
237:22-238:19	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, waste of time	238: 20 – 24
246:2-22		
250:6-11	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
253:10-21	Rules 401-402: relevance; Rule 403: prejudice, waste of time	
*257:13-258:19		
*264:13-265:19	Rules 401-402: relevance; Rule 403: prejudice; Rule 803: hearsay	*265:20 – 266:3
*268:3-15	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, confusing the issue	*268:16 – 269:6; *269:14 – 18; *270:15 – 271:3
*269:7-13	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice, confusing the issue	*268:16 – 269:6; *269:14 – 18; *270:15 – 271:3
*269:19-270:14	Rule 106: completeness; Rules 401-402: relevance, argumentative; Rule 403: prejudice, confusing the issue	*268:16 – 269:6; *269:14 – 18; *270:15 – 271:3
*271:4-272:9	Rule 106: completeness; Rules 401-402: relevance, argumentative; Rule 403: prejudice, confusing the issue; Rule 803: hearsay	*268:16 – 269:6; *269:14 – 18; *270:15 – 271:3; *272:10 – 16
*274:9-277:9	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time	
*277:16-286:5	Rule 501: privilege; Rules 401-402: relevance, speculation; Rule 403: prejudice, waste of time; Rule 602: foundation	
*287:5-288:1	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice	
289:1-294:12		
297:1-19		
298:1-299:4		
300:6-301:16	Rules 401-402: relevance, argumentative, speculation; Rule 403: prejudice, confusing the issue	
302:10-304:9	Rules 401-402: relevance, argumentative; Rule 403: prejudice, waste of time	
*304:24-306:18	Rule 501: privilege; Rule 106: completeness	*306:19 – 307:18
307:19-23	Rule 106: completeness	*306:19 – 307:18
308:5-15		

310:13-24		
311:21-312:14		
313:23-316:18	Rule 106: completeness	316:19 – 317:1
317:2-11		
318:17-319:7	Rules 401-402: relevance, speculation; Rule 403: prejudice	
*319:12-320:8	Rule 501: privilege; Rule 106: completeness; Rules 401-402: relevance, asked and answered; Rule 403: prejudice, waste of time	*319:8 – 11
*322:9-22	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice; Rule 803: hearsay	
323:10-325:2		
325:10-326:20	Rules 401-402: relevance; Rule 403: waste of time	
329:17-330:12	Rules 401-402: relevance; Rule 403: waste of time	
*331:23-334:24	Rule 501: privilege; Rules 401-402: relevance, speculation; Rule 403: prejudice, waste of time, confusing the issue	
335:23-336:9	Rules 401-402: speculation	
337:19-23		
*338:6-24	Rule 501: privilege; Rules 401-402: relevance, speculation, asked and answered; Rule 403: prejudice, waste of time	
*344:1-345:17	Rule 501: privilege; Rules 401-402: relevance, speculation; Rule 403: prejudice, waste of time	
*347:20-349:19	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time, confusing the issue	
*349:23-350:6	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time, confusing the issue	
*350:21-353:21	Rule 501: privilege; Rules 401-402: relevance, argumentative; Rule 403: prejudice, waste of time, confusing the issue	*354:16 – 22
*355:7-360:24	Rule 501: privilege; Rule 803: hearsay	
*362:20-363:20	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time	
*364:4-12	Rule 501: privilege; Rules 401-402: relevance; Rule 403: prejudice, waste of time	
*366:7-25	Rule 501: privilege	
*369:2-22	Rule 501: privilege;	
*370:12-372:4	Rule 501: privilege;	
373:24-376:13	Rules 401-402: relevance, asked and answered; Rule 403: prejudice, waste of time	
377:2-22		
380:4-381:18		
386:9-389:3		

389:18-393:24	Rule 106: completeness; Rules 401-402: relevance, speculation; Rule 403: prejudice; Rule 803: hearsay	393:25 – 394:25
395:9-396:19	Rule 106: completeness; Rules 401-402: relevance; Rule 403: prejudice	393:25 – 394:25
*397:5-400:24	Rule 501: privilege; Rule 106: completeness	401:8 – 402:18; 402:23 – 403:19
403:20-410:9	Rules 401-402: relevance, asked and answered, speculation; Rule 403: prejudice	401:8 – 402:18; 402:23 – 403:19; 410:10 – 412:13
412:14-417:2	Rules 401-402: relevance, speculation; Rule 403: prejudice; Rule 602: foundation	410:10 – 412:13
419:6-420:13		
421:3-14		
*423:7-424:25	Rule 501: privilege;	
*425:14-427:12	Rule 501: privilege;	
427:19-428:12		
*429:4-17	Rule 501: privilege; Rules 401-402: relevance, asked and answered; Rule 403: prejudice, waste of time	
439:8-440:1	Rule 106: completeness	435:7 – 15; 438:17 – 439:7
		<b>General Counter-Designation:</b> 401:8 – 402:18; 402:23 – 403:19; 431:8 – 438:12



<b>SPEAKER JAMES H. LUCAS (VOL. 1 – HOUSE PLAN LITIGATION – MAY 3, 2022)</b>		
<b>PLAINTIFFS’ DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER- DESIGNATIONS</b>
9:11-15		
28:6-32:13	Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 602: foundation	
34:3-12	Rules 401-402: relevance; Rule 403: cumulative	
59:3-66:1*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay	57:22-59:2
67:6-68:8*	Rules 401-402: relevance; Rule 403: confusion/waste of time; Rule 602: foundation	
73:12-77:13*	Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay	
78:5-78:16	Rule 106: completeness; Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 602: foundation	77:14-78:4
78:21-80:7	Rule 602: foundation; Rule 802: hearsay	
82:21-86:3	Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	
90:25-94:11*	Rules 401-402: relevance; Rule 403: cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
96:11-106:1	Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
109:1-112:15	Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	
112:24-115:25	Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	

119:23-124:15	Rule 403: cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
125:13-126:25	Rules 401-402: relevance; Rule 403: confusion/waste of time; Rule 501: privilege; Rule 802: hearsay	
127:5-132:3*	Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
133:12-136:16*	Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 602: foundation/speculation; Rule 802: hearsay	
145:23-150:1*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
Ex. 7	Rules 401-402: relevance; Rule 403: confusion; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Ex. 8	Rules 401-402: relevance; Rule 403: confusion; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Ex. 13	Rules 401-402: relevance; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Ex. 14*	Rules 401-402: relevance; Rule 403: cumulative; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Ex. 17	Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Ex. 20	Rules 401-402: relevance; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Ex. 21*	Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Ex. 22*	Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Ex. 23	Rule 403: cumulative; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	

Ex. 26	Rule 403: cumulative; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
Ex. 27	Rule 403: cumulative; Rule 602: foundation; Rule 802: hearsay; Rule 901(a): authentication	
<i>All portions of Mr. Lucas' deposition and accompanying exhibits were marked confidential. The individual designations identified above are those discrete designation pages that have been designated in the event the Court determines that the comprehensive designations are not warranted or are subject to challenge by Plaintiffs.</i>		

<b>JAMES H. LUCAS (JULY 1, 2022)</b>		
<b>PLAINTIFFS' DESIGNATIONS</b>	<b>OBJECTIONS</b>	<b>COUNTER-DESIGNATIONS</b>
4:8-11		
7:12-12:8	Rule 602: foundation/speculation; Rule 802: hearsay	
17:13-41:9*	Rules 401-402: relevance; Rule 403: confusion/waste of time; Rule 501: privilege; Rule 602: foundation/speculation	
41:17-43:9*	Rules 401-402: relevance; Rule 403: waste of time; 602: foundation/speculation	
44:2-4		
44:21-48:7*	Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
48:19-54:1	Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	
55:14-61:4	Rules 401-402: relevance; Rule 403: confusion; Rule 602: foundation; Rule 802: hearsay	
62:12-71:2*	Rules 401-402: relevance; Rule 403: confusion; Rule 602: foundation; Rule 802: hearsay	
71:24-72:21	Rules 401-402: relevance; Rule 403: waste of time	
73:12-16	Rule 106: completeness; Rules 401-402: relevance	73:17-74:3
74:4-81:4	Rules 401-402: relevance; Rule 403: cumulative; Rule 602: speculation; Rule 802: hearsay	
81:25-84:22	Rule 106: completeness; Rules 401-402: relevance; Rule 403: confusion; Rule 501: privilege; Rule 602: foundation; Rule 802: hearsay	
87:3-90:24	Rule 403: waste of time; Rule 602: foundation/speculation; Rule 802: hearsay	
92:1-108:18*	Rule 106: completeness; Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	122:20-124:10*
109:7-121:3*	Rules 401-402: relevance; Rule 403: confusion/waste of time/cumulative; Rule 501: privilege; Rule 602: foundation/speculation; Rule 802: hearsay	



46:14-48:5	Fed. R. Evid. 401, 402 & 403	Page 221:20 – 224:24	
54:13-58:3	Fed. R. Evid. 401, 402 & 403	Page _____ Lines _____ - _____	
58:22-83:6	Fed. R. Evid. 401, 402 & 403	Page 8 _____ Lines 14__ - 15__	
84:19-85:2	Fed. R. Evid. 401, 402 & 403	Page __ 85__ Lines _ 9_ - 12__	
85:14-22	Fed. R. Evid. 401, 402 & 403	Page 86 _____ Lines _ 2_ - _ 4_	
86:19-87:11	Fed. R. Evid. 401, 402 & 403	Page 86__ Lines _ 2_ - _ 4_	
87:18-95:17	Fed. R. Evid. 401, 402 & 403	Page __ 8 Lines 14_ - 15__	
97:5-104:9	Fed. R. Evid. 401, 402 & 403	Page 204:4 – 206:7__	
105:3-107:4	Fed. R. Evid. 401, 402 & 403	Page 219:4 – 220:7__	
110:18-112:24	Fed. R. Evid. 401, 402 & 403	Page 219:4 – 220:7__	
113:15-115:8	Fed. R. Evid. 401, 402 & 403	Page 219:4 – 220:7	
116:3-25	None	Page _____ Lines _____ - _____	
117:18-121:12	None	Page _____ Lines _____ - _____	
121:20-129:1	Fed. R. Evid. 401, 402 & 403	Page _____ Lines _____ - _____	

129:5-133:23	Fed. R. Evid. 401, 402 & 403	Page _____ Lines _____ - _____	
134:12-145:16	Fed. R. Evid. 401, 402 & 403	Page 133:24 – 134:11	
146:9-152:17	Fed. R. Evid. 401, 402 & 403	Page _ 146:5-8	
153:9-154:19	None		
155:9-158:16	None	Page _____ Lines _____ - _____	
159:5-161:3	None	Page _____ Lines _____ - _____	
161:18-162:14	Fed. R. Evid. 401, 402 & 403	Page 162:15 – 163:3	
163:9-171:18	Fed. R. Evid. 401, 402 & 403	Page 172:1 - 24	
175:20-176:9	Fed. R. Evid. 401, 402 & 403	Page _ 173:24 – 175:4_	
176:18-178:5	Fed. R. Evid. 401, 402 & 403	Page 176:10 - 17	
181:4-16	Fed. R. Evid. 401, 402 & 403	Page 198:8 – 200:1	
185:22-193:3	Fed. R. Evid. 401, 402 & 403	Page 227:20 – 228:16__	
231:7-232:13	Fed. R. Evid. 401, 402 & 403	Page _____ Lines _____ - _____	

DEPONENT NAME: <u>ADAM KINCAID</u> DATE OF DEPOSITION: <u>August 10, 2022</u>			
OFFERING PARTY: <u>Plaintiffs</u>			
<u>Plaintiffs</u>			<u>[party]</u>
DESIGNATION	OBJECTION EXPLAIN BASIS OF	COUNTER DESIGNATION	OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
7:13–16	None	None	
24:11–3–:16	None	None	
32:14–39:6	Fed. R. Evid. 401, 402 & 403	151:8–14	
42:3–46:2	Fed. R. Evid. 401, 402 & 403	45:1–4, 151:8– 152:16, 153:3– 12	
47:1–50:3	Fed. R. Evid. 401, 402 & 403	151:8–14	
51:5–22	Fed. R. Evid. 401, 402 & 403	151:8–14	
54:5–56:1	Fed. R. Evid. 401, 402 & 403	151:8–14	
57:9–66:21	Fed. R. Evid. 801–805	None	
67:9–68:6	None	None	
71:2–17:13	Depo designation is unclear due to typo in page range	71:2–73:1	
73:2–9	None	None	
73:12–75:6	None	75:7–17	
75:18–78:11	None	None	



80:10–84:6	Fed. R. Evid. 401, 402 & 403—inconsistent with motion in limine on others’ maps	149:10–151:7	
84:10–98:20	84:10–85:13; 91:3–16— Fed. R. Evid. 801–805  87:2–88:10—Fed. R. Evid. 401, 402 & 403—inconsistent with motion in limine on t others’ maps  98:6–12—Fed. R. Evid. 602 and calls for speculation	99:2–7	
99:11–102:9	Fed. R. Evid. 401, 402 & 403—inconsistent with motion in limine on others’ maps	149:10–151:7	
102:17–103:5	None.	102:7–103:5	
104:14–105:20	Fed. R. Evid. 602	None	
106:2–16	None	106:12–107:13	
107:14–108:19	None	108:20–109:20	
109:21–22	None	None	
110:6–115:13	113:12–18—Fed. R. Evid. 602, 701 & 702	115:14–117:2	
117:7–118:6	None	118:7–12	
118:21–122:3	118:21–119:13—Fed. R. Evid. 701, 702	122:4–7	

122:9–125:7	Fed. R. Evid. 401, 402 & 403—inconsistent with motion in limine on others’ maps  Fed. R. Evid. 602	None	
125:17–128:19	Fed. R. Evid. 401, 402 & 403	None	
135:11–137:8	Fed. R. Evid. 401, 402 & 403	151:8–152:16, 153:3–12	
140:19–22	None	None	
143:17–147:15	None	142:7–143:11	
		130:13–18	
		134:17–135:7	
		138:13–16	
		139:5–140:2	
		141:1–11	
		148:20–149:9	
		153:13–154:3	

DEPONENT NAME: <u>MAURA BAKER</u> DATE OF DEPOSITION: <u>August 12, 2022</u>			
OFFERING PARTY: <u>Plaintiffs</u>			
<u>Plaintiffs</u> [party] DESIGNATION	[party] OBJECTION EXPLAIN BASIS OF	[party] COUNTER DESIGNATION	[party] OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
4:20-5:3	None	None	
7:7-8:8	None	108:14–109:11	
16:18-23	None	None	
17:8-19	None	None	
19:16-21:6	None	None	
23:5-25:4	None	None	
35:20-36:21	None	36:22–25	
38:2-41:13	41:7–13—Fed. R. Evid. 602; witness not a 30(b)(6) for the Senate		
43:11-49:2	Fed. R. Evid. 602; witness not a 30(b)(6) for the Senate	108:14–109:11	
55:6-57:3	Fed. R. Evid. 602	57:7–14; 58:9– 60:13; 107:7–13	
60:14-61:10	None	61:11–62:2	
62:22-64:4	None	64:5–16; 65:19– 24	

68:9-70:22	None		
74:11-21	Fed. R. Evid. 401, 402		
75:1-89:20	84:24–88:4—Fed. R. Evid. 602	90:17–91:4	
91:5-101:13	91:12–20; 93:6–94:3; 100:8–101:13—Fed. R. Evid. 602; not a 30(b)(6) witness for the Senate  94:23–98:7—Fed. R. Evid. 401, 402		
102:13-105:12	102:13–103:12; 105:4–12—Fed. R. Evid. 602, 701 & 702		

DEPONENT NAME: <u>PAULA BENSON</u> DATE OF DEPOSITION: <u>AUG. 12, 2022</u>			
OFFERING PARTY: <u>PLAINTIFFS</u>			
<u>Plaintiffs</u>	---		[party]
DESIGNATION	OBJECTION EXPLAIN BASIS OF	COUNTER DESIGNATION	OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
8:16-8:22	Fed. R. Evid. 401, 402 & 403	Page <u>235</u> Lines <u>15</u> - <u>25</u>	
19:21-21:23	Fed. R. Evid. 401, 402 & 403	Page <u>236</u> Lines <u>6</u> - <u>19</u>	
28:2-29:3	None	Page _____ Lines _____ - _____	
30:19-31:7	None	Page _____ Lines _____ - _____	
33:12-38:22	Fed. R. Evid. 401, 402 & 403	Page <u>126</u> Lines <u>8</u> - <u>24</u>	
71:4-72:8	Fed. R. Evid. 401, 402 & 403	Page <u>227</u> Lines <u>8</u> - <u>24</u>	
80:20-83:1	Fed. R. Evid. 401, 402 & 403	Page <u>225</u> Lines <u>19</u> - <u>25</u>	
84:17-91:22	Fed. R. Evid. 401, 402 & 403	Page <u>237</u> Lines <u>21</u> - <u>23</u>	
93:5-102:3	Fed. R. Evid. 401, 402 & 403	Page <u>230:22</u> - <u>232:14</u>	
102:4-108:6	Fed. R. Evid. 401, 402 & 403	Page <u>233</u> Lines <u>16</u> - <u>25</u>	
110:2-110:22	Fed. R. Evid. 401, 402 & 403	Page <u>111</u> Lines <u>3</u> - <u>8</u>	

118:13-125:13	Fed. R. Evid. 401, 402 & 403	Page _127:6 - 128:7	
128:8-145:14	Fed. R. Evid. 401, 402 & 403	Page 234____ Lines _8 - 16____	
145:15-155:23	Fed. R. Evid. 401, 402 & 403	Page 156 _ Lines _1 -2	
156:3-159:12	Fed. R. Evid. 401, 402 & 403	Page 159 Lines _17 – 25____	
173:19-181:16	Fed. R. Evid. 401, 402 & 403	Page 160_ Lines _1 – 11	
182:1-183:10	None	Page _____ Lines _____ - _____	
184:4-187:5	Fed. R. Evid. 401, 402 & 403	Page 163____ Lines _16 - 25_	
187:22-206:7	Fed. R. Evid. 401, 402 & 403	Page _____ Lines _____ - _____	
207:10-210:10	Fed. R. Evid. 401, 402 & 403	Page _224_ Lines 8 - 24	

DEPONENT NAME: <u>LUKE RANKIN</u> DATE OF DEPOSITION: <u>August 16, 2022</u>			
OFFERING PARTY: <u>Plaintiffs</u>			
<u>Plaintiffs</u>			[party]
DESIGNATION	OBJECTION EXPLAIN BASIS OF	COUNTER DESIGNATION	OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
4:8—13	None		
7:19—8:1	None		
21:16—19	None	21:12—22:16	
23:11—22	None	23:23—25:6	
24:11—25:21	None	23:23—25:6	
28:1—34:7	29:16—30:4: Fed. R. Evid. 401, 402, 403  30:14—34:7: Fed. R. Evid. 401, 402, 403, 602; mischaracterizes testimony; asked and answered	28:1—29:15 30:5—13 35:7—37:8	
36:17—47:4	37:9—47:4: Fed. R. Evid. 401, 402, 403	36:17—37:8	
48:14—49:16	None	48:14—21 49:3—16	
50:25—52:7	None	51:9—52:1	
53:24—54:12	None		
55:17—61:23	57:7—12: Counsel mischaracterizes testimony; Fed. R. Evid. 401, 402, 403  58:13—19: Fed. R. Evid. 401, 402, 403		
64:4—70:18	None	69:14—71:9	

71:20—72:10	72:1—10: Fed. R. Evid. 401, 402, 403		
84:4—90:19	84:4—21: Fed. R. Evid. 401, 402, 403	84:21—87:9 88:4—91:25	
93:5—120:4	93:17—18: Fed. R. Evid. 401, 402, 403  101:12—23: Fed. R. Evid. 401, 402, 403  107:13—108:21: Fed. R. Evid. 401, 402, 403, 602  118:21—119:4: Fed. R. Evid. 401, 402, 403	94:21—24 102:11—107:12 109:23—110:3 111:4—22 112:20—113:7	
123:2—126:22	None	126:7—127:16	
130:17—131:5	Fed. R. Evid. 401, 402, 403	131:6—15 131:25—135:25	
137:10—138:15	None	137:10—141:20	
141:21—145:25	141:21—142:21: Fed. R. Evid. 401, 402, 403  143:6—24: Fed. R. Evid. 401, 402, 403  143:5—145:25: Fed. R. Evid. 401, 402, 403, 602, 701, 702	142:22—143:5 146:1—8	
148:21—151:24	148:21—151:2: Fed. R. Evid. 401, 402, 403, 602, 701, 702	152:16—154:7	
155:15—156:6	Fed. R. Evid. 401, 402, 403, 602, 701, 702	156:7—16	



157:4—173:24	<p>158:22—161:17: Fed. R. Evid. 401, 402, 403, 602, 701, 702</p> <p>162:7—163:25: Fed. R. Evid. 401, 402, 403, 602, 701, 702</p> <p>164:1—168:10: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p> <p>168:18—169:23: Fed. R. Evid. 401, 402, 403</p> <p>169:24—173:24: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p>	<p>157:4—158:21 161:18—162:6 168:11—17</p>	
174:17-176:17	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002		
179:6—183:11	<p>179:6—19: Fed. R. Evid. 401, 402, 403, 701, 702</p> <p>179:20—183:11: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p>	<p>178:16—179:5 183:12—184:7</p>	
187:3—188:10	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002		
188:13—195:3	<p>188:13—191:19: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p> <p>193:2—194:15: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p>	<p>191:20—193:1 194:16—195:3</p>	
195:24—202:18	<p>Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p> <p>198:5—17, 198:23—199:20: Plaintiffs’ counsel withdrew these questions after the deposition</p>		

204:2—209:12	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002	209:13—211:2	
212:16—217:25	214:3—216:13: Fed. R. Evid. 401, 402, 403, 602, 1002  216:23—217:12: Fed. R. Evid. 401, 402, 403, 602, 1002	212:16—214:2 218:8—219:6 220:16—223:19	
225:3—238:25	225:3—226:3: Fed. R. Evid. 401, 402, 403  226:4—228:7: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002  228:16—232:19: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002  232:20—238:25: Fed. R. Evid. 401, 402, 403	239:13—22	
240:7—244:24		245:10—247:18	
248:23—284:20	253:22—278:25: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002  279:1—280:17: Discussion among counsel; Fed. R. Evid. 401, 402, 403  280:18—284:20: Fed. R. Evid. 401, 402, 403	248:11—22 286:11—288:24	

DEPONENT NAME: <u>CHARLES TERRENI</u> DATE OF DEPOSITION: <u>August 16, 2022</u>			
OFFERING PARTY: <u>Plaintiffs</u>			
<u>Plaintiffs</u>			<u>[party]</u>
DESIGNATION	OBJECTION EXPLAIN BASIS OF	COUNTER DESIGNATION	OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
6:18—23	None		
8:10—76:15	8:10—31:23: Fed. R. Evid. 401, 402, 403, 701, 702  31:24—41:13: Fed. R. Evid. 401, 402, 403  41:22—48:12: Fed. R. Evid. 401, 402, 403  49:10—51:6: Fed. R. Evid. 401, 402, 403  52:16—55:22: Fed. R. Evid. 401, 402, 403	41:14—21 48:13—49:9 51:7—52:15 55:23—76:15	
77:3—170:21	77:3—4: Improper designation  82:19—83:11: Fed. R. Evid. 401, 402, 403  85:5—89:22: Fed. R. Evid. 401, 402, 403  89:23—91:12: Improper designation of discussion among counsel  94:23—96:15: Fed. R. Evid. 401, 402, 403, 701, 702	77:5—82:18 83:12—85:4 91:13—94:22 99:24—101:1 103:9—13 104:19—105:7 106:9—107:11 109:6—112:17 115:14—124:7 125:17—126:5 130:9—131:18 135:7—137:25 142:19—143:6 145:23—149:3 150:21—151:20 167:4—15	

	<p>96:19—99:23: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805, counsel mischaracterizes testimony and documents</p> <p>101:3—103:8: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p> <p>107:12—109:5: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805</p> <p>112:18—113:3: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805</p> <p>113:4—115:13: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805</p> <p>117:6—18: Fed. R. Evid. 401, 402, 403</p> <p>119:6—12: Fed. R. Evid. 401, 402, 403, 602</p> <p>124:8—125:16: Fed. R. Evid. 401, 402, 403, 602</p> <p>126:6—130:8: Fed. R. Evid. 401, 402, 403, 602</p> <p>131:19—135:6: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805</p> <p>138:1—142:2: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805</p> <p>142:16—18, 143:7—22: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805</p>		
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	151:21—152:13: Fed. R. Evid. 401, 402, 403, 602		
	167:16—170:21: Fed. R. Evid. 106, 401, 402, 403, 602		
172:7—246:3	<p>172:7—174:12: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805, 1002</p> <p>176:9—177:14: Fed. R. Evid. 401, 402, 403</p> <p>177:25—181:14: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805</p> <p>182:7—183:4: Fed. R. Evid. 401, 402, 403, 602</p> <p>184:5—185:11: Fed. R. Evid. 401, 402, 403, 602</p> <p>185:12—186:20: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805</p> <p>186:21—190:20: Fed. R. Evid. 401, 402, 403, 701, 702</p> <p>190:21—192:9: Fed. R. Evid. 401, 402, 403, 602</p> <p>194:4—14: Fed. R. Evid. 401, 402, 403, 602</p> <p>195:12—205:5: Fed. R. Evid. 401, 402, 403, 701, 702</p> <p>206:21—208:25: Fed. R. Evid. 401, 402, 403</p> <p>209:1—211:6: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805</p>	<p>174:13—176:8</p> <p>177:15—24</p> <p>181:15—182:6</p> <p>192:10—193:3</p> <p>194:15—195:11</p> <p>205:6—206:20</p> <p>211:7—16</p> <p>234:12—237:22</p> <p>238:9—240:19</p> <p>243:25—246:3</p>	

	<p>211:17—213:25: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805</p> <p>214:2—228:19: Fed. R. Evid. 106, 401, 402, 403, 602, 801-805, 1002</p> <p>228:20—234:11: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702 801-805, 1002</p> <p>237:23—238:8: Fed. R. Evid. 401, 402, 403, 701, 702</p> <p>240:20—243:24: Fed. R. Evid. 401, 402, 403, 701, 702</p>		
246:14—284:10	<p>253:24—260:25: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805, 1002</p> <p>267:8—276:4, 276:9—278:17, 278:18—281:21: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805, 1002</p>	<p>246:14—250:18 251:12—253:23 261:1—267:7 281:21—284:10</p>	
284:24—382:24	<p>295:23—301:8: Fed. R. Evid. 401, 402, 403, 602, 701, 702, 1002</p> <p>307:1—309:24: Fed. R. Evid. 401, 402, 403, 602</p> <p>309:25—313:15: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p> <p>315:12—317:8: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p>	<p>301:9—306:25 313:15—315:11 317:9—319:8 326:22—330:12 332:16—341:9 344:4—360:22 363:6—21 384:11—411:16</p>	

	<p>319:9—326:21: Fed. R. Evid. 401, 402, 403, 602</p> <p>330:13—332:15: Fed. R. Evid. 401, 402, 403</p> <p>341:10—344:3: Fed. R. Evid. 401, 402, 403</p> <p>360:23—363:5: Fed. R. Evid. 106, 401, 402, 403, 602</p> <p>363:22—380:12: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p>		
411:22—419:21	<p>411:22—418:9: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 1002</p> <p>418:10—419:22: Discussion among counsel</p>		

DEPONENT NAME: <u>SEN. GEORGE CAMPSSEN</u> DATE OF DEPOSITION: <u>August 5, 2022</u>			
OFFERING PARTY: <u>Plaintiffs</u>			
<u>Plaintiffs</u> [party] DESIGNATION	[party] OBJECTION EXPLAIN BASIS OF	[party] COUNTER DESIGNATION	[party] OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
8:1–17	Fed. R. Evid. 401 & 402;	None	
9:3–12	None	None	
24:9–25:9	None	25:10–26:22	
26:23–27:7	None	28:7–29:13; 30:1–31:12; 33:18–34:21	
28:2–6	None	None	
35:17–36:18	None	36:19–37:18	
37:19–24	None	37:24–38:1	
38:7–10	None	38:10–39:1	
40:13–41:3	None	39:3–40:12; 41:4–14	
41:18–21	None	None	
43:19–23	None	42:25–44:4	
44:5–11	None	None	
51:4–8	Fed. R. Evid. 602— leading, no foundation, facts not in evidence	None	
53:11–16	Fed. R. Evid. 602	None	



57:8–18	None	None	
58:17–59:18	None	59:19–60:5	
60:9–61:10	None	61:17–62:16	
63:17–64:17	None	64:18–21	
65:8–66:4	None	66:3–67:18	
66:10–67:14	None	68:1–11, 68:16– 69:11, 70:6– 72:9	
72:10–73:14	None	73:18–74:15	
74:16–75:4	None	75:5–24	
75:25–76:5	None	76:6–78:7	
80:5–16	None	79:15–81:22	
81:23–82:7	None	82:8–83:25	
84:1–13	None	None	
85:13–23	None	85:24–86:25	
87:1–22	None	87:23–88:21	
88:22–25	Fed. R. Evid. 602	None	
95:12–17	None	89:19–90:2; 93:11–97:10	

96:22–97:10	None	89:19–90:2; 93:11–97:10	
97:23–98:4	None	97:18–100:20	
101:4–102:6	None	None	
103:4–105:4	Fed. R. Evid. 602	105:5–9	
106:24–107:1	None	107:2–9	
108:5–12	None	108:13–109:17	
110:1–9	None	None	
111:4–6	None	110:10–111:3, 112:14–22	
114:1–115:8	Fed. R. Evid. 401 & 402—also inconsistent with Plaintiffs’ motion in limine on others’ maps	115:9–24	
115:25–118:20	Fed. R. Evid. 401 & 402—also inconsistent with Plaintiffs’ motion in limine on their and others’ maps	118:21–24	
119:12–121:25	None	122:8–123:7	
124:10–127:11	None	None	
130:13–131:15	Fed. R. Evid. 602, 701 & 702—also inconsistent with plaintiffs’ motion in limine on lay vs. expert testimony	131:16–134:10	
134:11–21	None	None	

135:1–137:3	None	137:4–18; 138:2–139:14	
140:4–13	None	140:14–141:25	
142:1–143:13	None	143:14–17, 144:6–146:14	
147:3–6	None	146:16–147:20	
147:21–148:3	None	148:4–20	
148:17–149:12	None	149:13–151:2	
151:11–152:2	None	152:3–21	
154:20–155:11	Fed. R. Evid. 602, 701 & 702—also inconsistent with plaintiffs’ motion in limine on lay vs. expert testimony	155:12–156:7	
156:8–159:3	None	None	
159:18–161:23	None	161:23–164:18	
171:3–8	None	None	
176:3–22	None	None	
179:18–180:19	None	None	
183:15–186:10	None	183:9–14; 186:11–18	
186:19–187:1	None	212:5–20; 187:11–188:1	

188:2–24	None	188:25–189:1	
189:12–190:18	Fed. R. Evid. 602, 701, 702 & 801–805	None	
191:12–24	Fed. R. Evid. 602	61:15–62:16; 192:18–193:3	
193:4–194:25	Fed. R. Evid. 602, 701, 702 & 801–805	195:1–19	
196:2–198:13	Fed. R. Evid. 401, 402, 403, 602	198:13–24	
199:16–200:20	None	202:1–204:13	
204:14–208:16	Fed. R. Evid. 602, 701, 702	208:17–209:17; 224:10–225:9	
215:9–18	None	215:4–23	
216:2–11	None	216:17–20	
		167:20–168:5	
		168:13–169:1	
		210:15–212:20	
		218:8–15	
		220:14–222:20	

DEPONENT NAME: <u>ANDY FIFFICK</u> DATE OF DEPOSITION: <u>July 21, 2022</u>			
OFFERING PARTY: <u>Plaintiffs</u>			
<u>Plaintiffs</u>	_____	_____	_____
DESIGNATION	OBJECTION EXPLAIN BASIS OF	COUNTER DESIGNATION	[party] OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
12:23-15:10	13:12-15:10: Fed. R. Evid. 401, 402, 403	6:23-25	
16:5-23	16:5-17: Fed. R. Evid. 401, 402, 403		
17:15-16	Fed. R. Evid. 401, 402, 403		
18:2-6	Fed. R. Evid. 401, 402, 403	18:5-10	
18:12-25	Fed. R. Evid. 401, 402, 403		
19:8-25			
20:3-10			
22:2-20			
22:23-23:5			
23:11-20			
24:1-5			
24:16-25:8			
25:15-26:11			
26:19-24		26:24-27:6	
27:7-13			
27:15-16			
28:7-10			
28:22-25			
29:1-13			

29:14-25		30:1-4	
30:15-31:11			
31:13-20		31:21-32:5	
32:6-18		32:18-23	
32:24-33:17		33:18-22	
34:24-35:2			
35:8-36:1			
36:19-37:18		37:18-20	
37:21-38:3		38:4-9	
38:10-39:11			
39:16-41:7			
41:15-42:1		42:2-13	
42:19-25		42:25-43:3	
43:24-44:13			
44:24-45:12			
46:16-19		46:20	
51:4-52:5		50:19-51:3 52:5-15	
52:19-53:10		53:10-54:18	
58:18-59:2		59:2-13	
59:14-22		59:23-60:1	
60:2-6		60:9-17	
60:18-61:8			
61:11-15	Improper designation: counsel question with no testimony of witness	61:14-17	
62:6-23		62:1-5	
63:3-8	Fed. R. Evid. 401, 402, 403		
63:17-25		63:25-64:4	

70:1-9		70:9-15	
71:1-4		71:5 72:8-18	
73:19-24		74:2-75:6	
74:15-75:2		74:2-75:6	
75:15-76:1		76:1-6	
76:7-12		76:13-77:23	
78:12-19 78:21-25		78:19-79:1	
79:2-10			
79:21-22			
80:3-21 81:5-14 82:10-20 84:5-21 85:5-16 85:24-86:3		80:2-86:6	
86:7-20		86:21-87:23	
87:3-88:5			
88:13-89:10 89:18-21 91:23-92:2		89:11-92:11	
93:4-94:10			
94:15-94:25			
95:1-96:3			
96:16-25			
97:8-10			
97:25-98:4		98:4-6	
98:11-21			
99:8-13			
99:24-100:3			
100:10-14			
100:16-101:17			

102:7-12			
103:13-18			
103:20-105:7			
105:23-106:16			
107:24-108:17			
110:21-111:15	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702		
111:17-112:20	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702		
113:21-115:9	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702		
115:20-116:7	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702		
116:21-118:7	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702		
118:17-119:4	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702		
119:9-120:3	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702		
120:5-121:14	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702		
122:4-21	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702		
123:5-130:8			
131:5-132:1	Fed. R. Evid. 401, 402, 403, 602, 701, 702, 801- 805		
132:19-133:7	Fed. R. Evid. 401, 402, 403, 602, 701, 702, 801- 805	133:8-11	
133:20-135:14			
138:2-139:25		140:1-5	
140:6-141:4			
141:11-14			



142:13-17 142:21-143:7 143:9-144:8	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805	144:9-22	
144:23-145:16	145:11-16: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		
146:5-8 146:10-12 146:16-149:2	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		
149:12-23			
150:3-8 150:23-151:2 151:6-152:6	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		
153:5-155:3 155:13-15	153:5-25: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805	155:4-12 155:16-25	
156:1-13 156:20-157:1	156:1-13: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805	157:14-20	
159:7-13	Fed. R. Evid. 401, 402, 403, 602, 701, 702		
160:12-162:24 163:2-7	160:22-161:6: Fed. R. Evid. 401, 402, 403, 602, 701, 702  162:17-163:7: Fed. R. Evid. 401, 402, 403, 602, 701, 702	162:25-163:1	
163:16-164:10			
164:15-25			
165:16-23			
166:10-20 167:2-169:13 169:23-170:1 170:10-19	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		
171:7-13			

171:17-25 172:3-9 172:11-12 172:14-16 172:18-177:6	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		
177:13-179:1	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		
179:15-25 180:9-181:13 181:15-25		179:10-14	
182:10-15 182:25-183:5 183:7-186:4 186:10-13 186:17-20 186:22-188:10 188:12-202:5	182:10-15, 182:25-183:5, 183:7-184:12: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		
202:8-205:8 205:12-20 205:24-217:22			
218:16-222:4 223:17-224:18 225:7-10 225:22-226:12 226:16-227:6 227:8-24		225:17-21	
228:11-231:4 231:9-232:25	230:4-12: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		
233:5-23			
234:1-3	Incomplete designation		
234:12-21	Fed. R. Evid. 602		
234:24-235:24			
236:4-237:11			
240:21-241:21 242:2-13			
243:2-244:21	Fed. R. Evid. 401, 402, 403, 602		
245:13-246:13 246:18-247:2			

247:5-254:4			
254:6-257:22		257:23-258:1	
258:2-24			
259:5-260:22		260:23-261:4	
261:5-20			
262:1-264:25			
265:16-18 267:6-268:12 268:20-269:16	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805	265:23-266:14 269:17-25	
270:1-15 270:25-271:10		270:16-24	
272:2-13 273:6-14 273:17-274:12 274:14-276:10 277:1-6		272:14-273:5 274:12-13 276:11-25 277:7-11	
277:12-278:4			
279:2-10 279:22-280:12 280:25-281:7		279:11-21 280:13-24 281:8-14	
281:15-282:18		282:18-283:2	
283:3-284:18			
285:5-13	Fed. R. Evid. 401, 402, 403		
287:12-22			
288:5 288:9-12 289:2-9			
292:9-12 292:14-293:16		291:10-292:8	
294:9-13 294:24-295:2 295:4-20	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		

296:3-17 296:22-297:13	296:10-17: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805  296:22-297:13: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805	296:18-21	
297:18-301:4 301:9-12 301:14-302:3	297:18-300:6: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805  301:9-12, 301:14-302:3: Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		
303:12-304:16			
305:3-6 305:8-12 305:17-21	Fed. R. Evid. 106, 401, 402, 403, 602, 701, 702, 801-805		
306:1-4 306:7-12 306:14-307:9			
307:20-308:11			
309:3-11			
310:8-18			
311:20-313:8	312:16-313:4: Fed. R. Evid. 401, 402, 403, 602		
313:20-24 314:1-5 314:7-318:10 318:12-319:16 319:19-24 320:1-11 320:19-321:25 322:2-324:4 324:20-325:4 325:6-18		327:10-357:6	
338:17-24			
358:2-7 358:22-359:2			

DEPONENT NAME: <u>BREEDEN JOHN</u> DATE OF DEPOSITION: <u>August 9, 2022</u>			
OFFERING PARTY: <u>Plaintiffs</u>			
<u>Plaintiffs</u> [party] DESIGNATION	<u>                    </u> [party] OBJECTION EXPLAIN BASIS OF	<u>                    </u> [party] COUNTER DESIGNATION	<u>                    </u> [party] OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
5:1–5	None	None	
7:5–7	None	None	
15:19–16:13	None	None	
17:22–20:13	None	None	
20:14–21:15	None	21:16–23	
24:14–18	Fed. R. Evid. 401, 402, 403		
37:7–17	None	37:18	
44:16–45:8	None	None	
53:6–54:13	None	45:20–54:25	
55:2–13	None	55:14–56:7	
56:8–10	Fed. R. Evid. 401, 402	56:11–57:13	
59:4–60:6	Fed. R. Evid. 602	None	
61:14–62:14	None	62:15–63:11	
64:16–22	None	None	
65:6–8	None	None	

65:9–66:25	66:3–5—leading	64:16–22	
67:18–68:5	Fed. R. Civ. P. 602—not 30(b)(6) witness for the Senate	67:2–17	
70:66–73:8	None	73:9–74:9	
78:8–81:14	None	81:15–82:16	
83:4–92:25	Fed. R. Evid. 602	None	
93:10–100:21	Fed. R. Evid. 401, 402, 602	None	
100:23–101:19	Fed. R. Evid. 401, 402	None	
102:17–106:20	Fed. R. Evid. 401, 402, 403	106:13–107:6	
107:7–109:2	Fed. R. Evid. 401, 402, 403	None	
109:3–110:3	Fed. R. Evid. 401, 402	None	
111:9–113:5	None	None	
113:20–23	Fed. R. Evid. 401, 402, 403	113:24–115:14	
115:15–17	Fed. R. Evid. 401, 402	115:18–116:14	
116:22–118:13	Fed. R. Evid. 401, 402, 403	116:15–118:10	
120:6–20	Fed. R. Evid. 401, 402, 403	120:15–121:24	
122:6–15	Fed. R. Evid. 403	None	

124:2–125:2	Fed. R. Evid. 403	125:3–127:3	
127:4–131:21	Fed. R. Evid. 403	131:22–132:9	
132:10–135:15	Fed. R. Evid. 401, 402, 403	135:16–136:3	
136:4–17	Fed. R. Evid. 401, 402, 403	266:20–268:23	
140:13–142:16	Fed. R. Evid. 401, 402, 403, 701, 702	142:17–143:4	
143:5–18	None	143:19–144:18	
144:23–145:14	None	145:15–148:17	
148:21–152:23	Fed. R. Evid. 401, 402, 403, 602, 701, 702	152:24–153:25	
154:19–161:16	Fed. R. Evid. 401, 402, 403, 602, 701, 702	264:7–14	
167:22–172:11	Fed. R. Evid. 401, 402	172:21–173:3	
173:4–180:4	173:9–175:15—Fed. R. Evid. 401, 402	180:3–12	
180:13–189:22	Fed. R. Evid. 403, 701, 702	189:23–191:19	
191:20–192:8	None	192:9–193:8	
193:9–12	Fed. R. Evid. 403, 602, leading, facts not in evidence	193:13–25	
194:2–7	Fed. R. Evid. 401, 402, 403	194:8–195:11	
195:12–196:20	Fed. R. Evid. 403, leading	None	

198:21–199:12	None	198:2–20; 199:16–20	
199:21–201:2	Fed. R. Evid. 401, 402, cumulative	None	
201:16–202:17	None	202:18–203:21	
203:22–209:23	Fed. R. Evid. 401, 402, 403, 602	271:18–272:15; 210:3–15	
211:2–212:16	None	212:17–213:7	
213:8–24	None	213:25–214:23	
214:24–217:10	None	217:11–22	
218:9–220:17	None	220:18–221:6	
221:7–222:24	None	275:15–276:22	
223:12–227:17	None	217:16–229:6	
229:7–231:6	None	231:7–23	
233:11–235:20	Fed. R. Evid. 602	235:21–236:10	
236:11–238:14	Fed. R. Evid. 602	None	
241:10–22	None	240:20–241:9; 241:23–242:21	
242:22–247:20	Fed. R. Evid. 403, 701, 702, 801–805	None	
277:5–7	None	250:15–254:18; 277:8–278:7	



279:20–280:4	None	280:5–11	
280:12–23	None	None	
282:2–289:14	Fed. R. Evid. 401, 402, 403, 602, 701, 702	289:15–290:17; 293:6–295:18	
290:18–292:24	None	274:4–275:14	
		28:17–29:1	
		76:8–77:22	
		162:3–166:8	
		255:20–263:19	
		264:7–274:3	

DEPONENT NAME: <u>WILL ROBERTS</u> DATE OF DEPOSITION: <u>July 7, 2022</u>			
OFFERING PARTY: <u>Plaintiffs</u>			
<u>Plaintiffs</u>			[party]
DESIGNATION	OBJECTION EXPLAIN BASIS OF	COUNTER DESIGNATION	OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
4:18-5:2			
7:18-21			
19:5-20:10			
21:13-22:16		20:22-21:12 22:17-18	
24:1-25			
25:9-20			
25:21-26:13	25:21-23: Counsel testifying		
26:21-23			
27:4-13		27:18-24	
35:7-14			
35:19-24		35:15-18	
37:18-22			
46:7-12 46:20-47:4		41:2-47:22	
48:6-13			
49:10-20		48:25-49:9	
50:11-17	Fed. R. Evid. 401, 402, 403, 602		
51:5-13		51:14-18	
52:24-53:9	52:24-53:1: Counsel testifying	53:10-15	
53:19-54:5			

55:10-12			
58:18-23			
59:11-60:2			
61:6-16			
63:20-23		62:2-63:19 63:24-64:5	
64:6-8 64:15-65:5		64:9-14 65:6-17	
65:17-66:12		66:13-23	
68:21-69:13	Fed. R. Evid. 401, 402, 403, 701, 702		
69:19-21			
70:22-71:23			
72:24-73:4	Fed. R. Evid. 401, 402, 403, 701, 702		
73:12- 77:23	72:24-73:4: Fed. R. Evid. 401, 402, 403, 701, 702  73:13-24: Fed. R. Evid. 401, 402, 403, 701, 702  75:18-22: Fed. R. Evid. 106, 401, 402, 403		
77:24-81:18	76:17-77:23: Fed. R. Evid. 106, 401, 402, 403  81:16-18: Question designated with no answer		
82:9-84:18		84:19-20	
84:21-25			
85:12-23	85:12-19: Technical issue; no testimony 85:20-23: Question designated with no answer		
86:6-90:25	86:6-10: Technical issue; no testimony		

91:18-97:23	96:18-97:6: Fed. R. Evid. 401, 402, 403, 701, 702		
97:25-100:8		100:9-101:2	
101:3-104:20	103:1-7: Fed. R. Evid. 401, 402, 403, 701, 702		
105:19-110:3	107:5-13: Objection and question rephrased	110:4-113:7	
113:8-16			
113:17-21			
114:1-117:1	115:20-116:10: Fed. R. Evid. 401, 402, 403, 602		
117:17-20	Fed. R. Evid. 106, 401, 402, 403, 801-805		
118:16-24		118:11-15	
119:25-120:12		118:25-119:24 120:13-16	
121:22-123:8			
127:1-131:2	128:3-128:16: Fed. R. Evid. 401, 402, 403, 701, 702  128:25-130:1: Fed. R. Evid. 401, 402, 403, 701, 702		
131:17-132:21			
132:22-133:7			
133:24-134:2			
134:3- 137:15			
137:24-138:3	Fed. R. Evid. 401, 402, 403, 602	138:13-139:9	
139:24-140:7		140:8-18 143:1-23	
147:10-23		148:2-12	
150:19-25			

151:11-15			
152:21-154:2	Fed. R. Evid. 106, 401, 402, 403, 602	154:4-10	
154:11-24			
155:23-156:17			
158:4-13			
159:4-9			
159:10-167:13		167:14-19 167:25-168:11	
168:18-21			
168:22-169:10		169:11-170:5	
170:6-8			
170:9-171:1		171:2-14	
171:15-19		171:20-172:7	
172:8-178:20			
179:5-13 179:23-25		179:14-22	
180:1-181:10			
181:20-24			
181:25-184:4	181:25-183:20: Fed. R. Evid. 106, 401, 402, 403, 801-805  183:25-184:4: Mischaracterizes testimony	179:5-13 184:5-9	
184:15-17			
186:2-20	Fed. R. Evid. 401, 402, 403, 701, 702	187:18-188:10	
193:25-195:1		192:18-193:24	
196:7-199:11			

200:1-202:17	200:1-200:24: Fed. R. Evid. 106, 401, 402, 403, 602		
204:3-208:9			
208:21-210:16			
212:20-221:25	214:9-22: Fed. R. Evid. 401, 402, 403, 602 214:23-215:14: Fed. R. Evid. 401, 402, 403, 602, 701, 702 216:8-18: Fed. R. Evid. 401, 402, 403, 602 217:19-218:1: Mischaracterizes testimony; counsel withdrew the question 218:2-16: Fed. R. Evid. 401, 402, 403, 602 219:18-220:23: Fed. R. Evid. 401, 402, 403, 602		
222:1-22			
223:13-229:24	228:18-229:9: Fed. R. Evid. 401, 402, 403, 701, 702	230:4-231:1	
234:4-8			
234:19-236:13			
242:21-25			
247:14-248:8		251:3-253:15 254:23-255:17 256:14-257:3 257:10-258:11	
259:14-17			
259:21-260:1		260:2-5	
260:6-261:2		261:3-20	